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5 **UNITED STATES DISTRICT COURT**
6
7 **DISTRICT OF NEVADA**

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9 LEE REED, } CASE NO: 2:21-cv-00942-APG-EJY
10 Petitioner, }
11 vs. } **MOTION FOR EXTENSION OF TIME**
12 CALVIN JOHNSON, WARDEN, et al., } **TO FILE MR. LEE REED'S SIGNED**
13 Respondents. } **DECLARATION IN SUPPORT OF HIS**
14 } **MOTION TO DISMISS GROUND 3.B OF**
15 } **HIS PETITION FOR WRIT OF HABEAS**
16 } **CORPUS**
17 } (First Request)
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17 COMES NOW, Petitioner LEE REED, by and through his counsel of record,
18 CHRISTOPHER R. ORAM, ESQ., and hereby files this Motion for Extension of Time to
19 File Mr. Lee Reed's Signed Declaration in Support of His Motion to Dismiss Ground 3.B of
20 His Petition for Writ of Habeas Corpus. Counsel requests that the deadline to file the Signed
21 Declaration in Support of His Motion to Dismiss Ground 3.B of His Petition for Writ of
22 Habeas Corpus, which is currently due on June 13, 2022, be extended by a period of ten (10)
23 days, until and including June 23, 2022.

24 Dated this 13th day of June, 2022.

25 Respectfully Submitted By:
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/s/ *Christopher R. Oram*
Christopher R. Oram, Esq.
520 S. Fourth Street, Second Floor
Las Vegas, Nevada 89101
Attorneys for Petitioner Reed

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2 **POINTS AND AUTHORITIES**

3 On April 30, 2022 this Court ordered Mr. Reed to file a motion for dismissal.
4 Pursuant to the order Mr. Reed was to file his signed affidavit consenting to the motion for
5 dismissal by June 13, 2022

6 Mr. Reed filed his motion to dismiss in a timely fashion. Mr. Reed has orally agreed
7 to the motion to dismiss however, counsel has yet to receive the signed declaration. Upon
8 information and belief, the declaration should be forthcoming.

9 For the reasons outlined above, as well as difficulties with prisoner's mailing during
10 the Covid 19 pandemic, Mr. Reed respectfully requests that this Court grant the instant
11 extension, which will allow counsel to file Mr. Reed's signed declaration as soon as it is
12 received or by June 23, 2022.

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14 Dated this 13th day of June, 2022.

15 Respectfully Submitted By:
16

17 */s/ Christopher R. Oram* _____
18 Christopher R. Oram, Esq.
19 520 S. Fourth Street, Second Floor
 Las Vegas, Nevada 89101
 Attorneys for Petitioner Reed

20 IT IS SO ORDERED:

21 Dated: June 13, 2022

22 
23 ANDREW P. GORDON
24 UNITED STATES DISTRICT JUDGE